

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Carrie Herr, on behalf of herself and all others)	Case No. 1:12-cv-07089
similarly situated,)	
) Judge John Z. Lee
Plaintiff,)	
) PLAINTIFF’S MOTION FOR ENTRY OF
vs.)	A CONSENT JUDGMENT
)
Frontline Asset Strategies, LLC, and)	
United Debt Holding, LLC,)	
)
Defendants.)	
)

Plaintiff Carrie Herr moves this Court to enter a consent judgment against Defendants in this matter. In support, Plaintiff states as follows:

1. Defendants offered to pay Plaintiff \$1001.00 to settle Plaintiff’s claims pursuant to the Fair Debt Collection Practices Act, with the further agreement that Defendants shall compensate Plaintiff for her attorneys’ fees and costs in an amount to be determined by this Court.
2. Specifically, the parties have agreed to settle this matter pursuant to the following terms:
 - a. Defendants shall pay Plaintiff \$1,001.00; and
 - b. Defendants shall pay Plaintiff’s attorneys’ fees and costs in an amount to be determined by this Court.

Plaintiff therefore requests that this Court enter a consent judgment against Defendants in the amount of \$1,001.00. Plaintiff also requests that this Court retain jurisdiction over this matter and set a briefing schedule for Plaintiff to file a petition for attorneys’ fees and costs, for Defendants to respond to that petition, and for Plaintiff to reply in support of her petition.

WHEREFORE, Plaintiff requests that this Court enter a consent judgment in relation to Plaintiff's claims pursuant to the Fair Debt Collection Practices Act and retain jurisdiction on the remaining issue of Plaintiff's attorneys' fees and costs.

Dated: December 17, 2012.

Respectfully submitted,

By: /s/ Alex D. Weisberg
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CERTIFICATE OF CONFERENCE

I, an attorney, hereby certify that on December 14, 2012, I communicated with Counsel for Defendants, Justin Penn. Mr. Penn was out of the office and unable to state whether Defendants object to, or do not object to, Plaintiff's Motion for Entry of a Consent Judgment. Mr. Penn offered to review the motion and speak with Defendants on Monday, December 17, 2012. However, Plaintiff sought to comply with Judge Lee's motion practice standards by submitting her Motion for Entry of a Consent Judgment today, December 14, 2012, three business days before the status conference scheduled for December 19, 2012 so that this Court will hear the motion on that day.

/s/Alex Weisberg
Alex Weisberg

CERTIFICATE OF SERVICE

I, an attorney, hereby certify that on December 17, 2012, I electronically filed the foregoing Motion for Entry of a Consent Judgment with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Alex Weisberg
Alex Weisberg